



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

March 12, 2008

Forrest Hawman
Nevada Power Company
6226 West Sahara Avenue
PO Box 98910, MS 30
Las Vegas, NV 89102-3032

Re: **Nevada Power Company (NPC)**
Reid Gardner Station
NDEP Facility ID #H-000530

Nevada Division of Environmental Protection Response to:
Closure Plan, Administrative Order on Consent Activities, Nevada Power Company, Reid Gardner Station (FINAL)
Dated January 11, 2008

Dear Mr. Hawman:

The Nevada Division of Environmental Protection (NDEP) has received and reviewed NPC's above-identified document and finds that the document is acceptable with the following comments (see attached Comments Tracking Form) noted for the administrative record. Please contact the undersigned with any questions or comments about this letter at (702) 486-2850 ext 240 or sharbour@ndep.nv.gov.

Sincerely,

Shannon Harbour, P.E.
Staff Engineer III
Special Projects Branch
Bureau of Corrective Actions, NDEP

SH:sh

cc: Jim Najima, Chief, Bureau of Corrective Actions, NDEP, Carson City, NV
Brian Rakvica, Bureau of Corrective Actions, NDEP, Las Vegas, NV
Tansey Anderson, Tribal-State Environmental Liaison, NDEP, Carson City, NV
Dennis Campbell, Clark County Health District, PO Box 3902, Las Vegas, NV 89127
Philbert Swain, Moapa Band of Paiute, Chairperson, P.O. Box 340, Moapa, NV 89025
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James Gleim, Department of Water Resources, 1416 9th Street, Room 620-2, PO Box 942836, Sacramento CA 94236-0001
Tony Garcia, Nevada Power Company, PO Box 98910 MS 30, Las Vegas, 89151-0001
David Phillips, Nevada Power Company, PO Box 98910 MS 30, Las Vegas, 89151-0001
Becky Svatos, Stanley Consultants, Inc., 2658 Crosspark Road, Suite 100, Coralville, IA 52241
John Kivett, LFR, 8961 West Sahara Avenue, Suite 106, Las Vegas, NV 89117

Document and Response to Comments Tracking Form
Nevada Power Company – Reid Gardner Station
Administrative Order On Consent Implementation

Document Title Closure Plan

Preparer Stanley Consultants

Draft #1

To NPC

From NDEP

Submittal Date 11/13/07

Comment Date 12/07/07, 03/12/08

Response Date 01/11/08

Shannon Harbour, P.E.

Commenter NDEP

Responder NPC

Comment #1 (11/13/07)

General Comment, the NDEP noted several instances where NPC used “rules” to describe regulations throughout the document. Please replace the word “rules” with “regulations” where appropriate.

Response #1 (12/07/07)

The word “rules” was replaced with the word “regulations” where applicable in the report when referring to Nevada regulations.

NDEP Comment #1 (03/12/08)

NDEP acknowledges that NPC has addressed this comment.

Comment #2 (11/13/07)

Section 1, pg 1-2, first paragraph, NPC states that decanted wastewater is discharged into “one of five active evaporation ponds”. Please revise this statement to include the two evaporation ponds currently out-of-service for relining.

Response #2 (12/07/07)

This statement has been revised to include the two evaporation ponds currently out-of-service for relining.

NDEP Comment #2 (03/12/08)

NDEP acknowledges that NPC has addressed this comment.

Comment #3 (11/13/07)

Section 1, pg 1-2, first full paragraph, please clarify whether the evaporation and settling ponds were originally constructed with an engineered clay liner or were constructed using a naturally occurring clay layer.

Response #3 (12/07/07)

This section was revised to clarify that the ponds did not have engineered clay liners. Ponds F and G were designed and constructed with clay cores in the berms.

NDEP Comment #3 (03/12/08)

NDEP acknowledges that NPC has addressed this comment.

Comment #4 (11/13/07)

Section 1, pg 1-3, first paragraph, please revise the last sentence to state “regulations and regulatory guidelines” instead of just “regulatory guidelines”.

Response #4 (12/07/07)

The sentence was revised to include the wording “regulations and regulatory guidelines”.

NDEP Comment #4 (03/12/08)

NDEP acknowledges that NPC has addressed this comment.

Comment #5 (11/13/07)

Section 2.1.1, pg 2-2, please revise the first paragraph to more accurately reflect the language used in the summarized regulations of this section; otherwise, NPC may incorporate the citations by reference or by quoting text of citations.

Response #5 (12/07/07)

This section was revised to include the detailed language used in the regulations.

NDEP Comment #5 (03/12/08)

NDEP acknowledges that NPC has addressed this comment.

Comment #6 (11/13/07)

Section 2.1.2, pg 2-2, please clarify that the conditions listed in this section do not apply to this facility.

Response #6 (12/07/07)

This section has been revised to indicate that NPC would not be eligible for the exemption available if the total dissolved solids (TDS) concentration in the unaffected groundwater is more than 10,000 milligrams per liter (mg/L) and the groundwater is not reasonably expected to be a source of drinking water. This exemption would not apply because unaffected groundwater at the Station has a TDS concentration of less than 10,000 mg/L.

NDEP Comment #6 (03/12/08)

NDEP acknowledges that NPC has addressed this comment.

Comment #7 (11/13/07)

Section 2.2.1, pg 2-3, please revise the first paragraph to more accurately reflect the language used in the summarized regulations of this section; otherwise, NPC may incorporate the citations by reference or by quoting text of citations.

Response #7 (12/07/07)

This section was revised to include the detailed language used in the regulations.
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NDEP Comment #7 (03/12/08)

NDEP acknowledges that NPC has addressed this comment.

Comment #8 (11/13/07)

Section 2.2, pg 2-3, per discussion at a December 6, 2007 meeting between NDEP and NPC, please delete the last sentence in this paragraph.

Response #8 (12/07/07)

This sentence has been deleted.

NDEP Comment #8 (03/12/08)

NDEP acknowledges that NPC has addressed this comment.